

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
v.	)	No. 08 CR 192
	)	Hon. Ruben Castillo
HANJUAN JIN.	)	

**AGREED MOTION TO RESET PRETRIAL ORDER**

Defendant **Hanjuan Jin** hereby moves this Honorable Court to reset the pretrial order regarding discovery and filing of pretrial motions. The following is offered in support of this motion.

1. The defendant is charged with Theft of Trade Secrets.
2. Attorney Terrence H. Campbell appeared on behalf of the defendant before the Magistrate and the District Court for the purposes of pretrial release and arraignment. On April 9, 2008, the District Court entered a discovery order requiring a Rule 16.1 conference on or before April 16, 2008, and pretrial motions filed on or before May 16, 2008.
3. On May 13, 2008, attorneys Thomas M. Breen and Todd S. Pugh filed their appearances on behalf of the defendant. Attorney Terrence H. Campbell no longer represents the defendant.
4. The undersigned attorney spoke with AUSA Steven Dollear regarding discovery in this matter. AUSA Dollear indicated that several issues exist regarding the government's ability to tender discovery in this matter. In particular, a portion of the discovery materials may be subject to privileges.
5. Thus, due to the recent change and representation and the outstanding discovery issues, the parties agree that the Court's pretrial order

concerning discovery and pretrial motions should be stricken until further order of Court.

6. This matter is currently set for a status hearing on May 28, 2008. The parties expect to bring all unresolved issues to the Court's attention at that time. AUSA Dollear concurs with the content of this motion.

Wherefore, the defendant seeks an extension of the Court's deadline for filing of pretrial motions.

Respectfully,

/s/ Todd S. Pugh  
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**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that the following document:

**AGREED MOTION TO RESET PRETRIAL ORDER**

was served on **Monday, May 19, 2008**, in accordance with Fed. R. Crim. P. 49, Fed. R. Civ. P. 5, LR 5.5, and the General Order on Electronic Case Filing (ECF) pursuant to the district court's system as to ECF filers.

s/ Todd S. Pugh